

PCM7.12.22
KSC: USAO#2022R0409

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

CRIMINAL NO.

JKB-22-0247

*OSCAR EFFRAIN ZAVALA URREA,
aka Raro, Desobidente,*

and

**(Possession of a Firearm by a
Prohibited Person, 18 U.S.C. §
922(g), 28 U.S.C. § 2461(c), 18 U.S.C.
§ 924(d))**

**JOSE LUIS LAINEZ-MARTINEZ,
aka Grifo.**

Defendants.

* * * * * * * * * * * *

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

On or about May 26, 2020, in the District of Maryland, the defendants,

**OSCAR EFFRAIN ZAVALA URREA,
aka Raro, Desobidiente,
and
JOSE LUIS LAINEZ-MARTINEZ,
aka Grifo,**

being aliens illegally and unlawfully in the United States, and knowing that they were aliens illegally and unlawfully in the United States, did knowingly possess firearms and ammunition, to wit, (1) a Smith & Wesson .357 Magnum revolver with an altered serial number, loaded with six rounds of PPU .357 SPL ammo, and (2) a Lorcin L380 .380 caliber semi-automatic handgun, bearing serial number 231367, with a magazine loaded with 4 rounds of Federal .380 auto and one round of Winchester .380 auto ammo, in and affecting commerce.

18 U.S.C. § 922(g)(5)(A)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924, and 28 U.S.C. § 2461(c), in the event of the defendants' convictions.

Firearms and Ammunition Forfeiture

2. Pursuant to 18 U.S.C. § 924(d), upon conviction of the offense alleged in Count One, the defendant(s) shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the offense.

Property Subject to Forfeiture

3. The property to be forfeited includes, but is not limited to, the following:
 - a. a Smith & Wesson .357 Magnum revolver with an altered serial number;
 - b. approximately six rounds of PPU .357 SPL ammunition;
 - c. a Lorcin L380 .380 caliber semi-automatic handgun, bearing serial number 231367;
 - d. a magazine loaded with approximately 4 rounds of Federal .380 auto ammunition; and
 - e. approximately one round of Winchester .380 auto ammunition.

28 U.S.C. § 2461(c)
18 U.S.C. § 924(d)

Erik L. Barron
ERIK L. BARRON
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

7/13/2022
Date: